

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
CENTRAL DIVISION

---

UNITED STATES OF AMERICA,

CR 20-30127

Plaintiff,

REDACTED INDICTMENT

vs.

ROBERT JOHNSON, a/k/a  
Pitbull,

Defendant.

ASSAULT WITH INTENT TO COMMIT  
MURDER, ASSAULT WITH A  
DANGEROUS WEAPON, ASSAULT  
RESULTING IN SERIOUS BODILY  
INJURY, ROBBERY, and  
DISCHARGING, BRANDISHING,  
CARRYING, OR POSSESSING A  
FIREARM DURING AND IN  
RELATION TO A CRIME OF  
VIOLENCE

18 U.S.C. §§ 1153, 113(a)(1),  
113(a)(3), 113(a)(6), 2111, and  
924(c)(1)(A)

---

The Grand Jury charges:

COUNT I

On or about the 20th day of June, 2020, at Lower Brule, in Lyman County, in Indian country, in the District of South Dakota, the defendant, Robert Johnson, a/k/a Pitbull, an Indian, did unlawfully assault Cole Brouse, with the intent to commit murder, by shooting him with a shotgun, in violation of 18 U.S.C. §§ 1153 and 113(a)(1).

COUNT II

On or about the 20th day of June, 2020, at Lower Brule, in Lyman County, in Indian country, in the District of South Dakota, the defendant, Robert

Johnson, a/k/a Pitbull, an Indian, did unlawfully assault Cole Brouse, with a dangerous weapon, that is, a shotgun, with intent to do bodily harm to Cole Brouse, in violation of 18 U.S.C. §§ 1153 and 113(a)(3).

#### COUNT III

On or about the 20th day of June, 2020, at Lower Brule, in Lyman County, in Indian country, in the District of South Dakota, the defendant, Robert Johnson, a/k/a Pitbull, an Indian, did unlawfully assault Cole Brouse, and said assault resulted in serious bodily injury, in violation of 18 U.S.C. §§ 1153 and 113(a)(6).

#### COUNT IV

On or about the 20th day of June, 2020, at Lower Brule, in Lyman County, in Indian country, in the District of South Dakota, the defendant, Robert Johnson, a/k/a Pitbull, an Indian, did by force, violence, and intimidation, take from the person and presence of another a thing of value, that is, a black duffle bag and its contents, in violation of 18 U.S.C. §§ 1153 and 2111.

#### COUNT V

On or about the 20th day of June, 2020, at Lower Brule, in Lyman County, in the District of South Dakota, Robert Johnson, a/k/a Pitbull, did knowingly carry and use a firearm, that is an 870 Express Magnum 20 gauge shotgun, bearing serial number AB382235U, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, assault with intent to commit murder, assault with a dangerous weapon, assault

resulting in serious bodily injury, and robbery, and he did discharge the firearm during the offense, in violation of 18 U.S.C. § 924(c)(1)(A).

A TRUE BILL:

**NAME REDACTED**

Foreperson

RONALD A. PARSONS, JR.  
United States Attorney

By: 